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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Local Exchange Carriers' Rates, )  
Terms and Conditions for ) CC Docket No. 93-162  
Expanded Interconnection for )  
Special Access )

**MOTION FOR EXTENSION OF TIME TO FILE DIRECT CASE**

BellSouth Telecommunications, Inc. ("BellSouth") hereby respectfully requests an extension of time until September 13, 1993, in which to file its Direct Case in the above captioned Investigation. The additional time is needed in order for BellSouth to properly address the many issues designated and assemble the enormous amount of detailed documentation and data in the format required by the Bureaus' Order.<sup>1</sup> BellSouth also requests that it be given 30 days from the date upon which replies and oppositions are filed, to file its Rebuttal.

The Common Carrier Bureau instituted its investigation into the Special Access Expanded Interconnection ("EIS") tariff filings of BellSouth and other tier 1 Local Exchange Carriers ("LECs") by order dated June 9, 1993.<sup>2</sup> By order dated July 23, 1993, the Bureau designated 16 distinct

<sup>1</sup> Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access, CC Docket No. 93-162, DA 93-951, released July 23, 1993 ("Designation Order").

<sup>2</sup> Ameritech Operating Companies, Transmittal Nos. 697, et al., 8 FCC Rcd 4589 (1993).

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issues for investigation.<sup>3</sup> LECs were given a mere three weeks, (19 days) to submit their Direct Cases<sup>4</sup>. Conversely, parties responding to the Direct Cases were given 30 days to file comments or oppositions.<sup>5</sup> Only 10 days were given to file rebuttals.<sup>6</sup>

For the reasons given herein, three weeks is not enough time for BellSouth to adequately address the designated issues and properly assemble its Direct Case in the format and detail required by the Bureau's Order.

First, to aid in its investigation, the Bureau has specified that all cost information must be provided in a uniform format, as required by the Tariff Review Plan ("TRP").<sup>7</sup> The TRP format requires the categorization of rate elements into 14 distinct functions many of which will include two or more rate elements. Therefore, additional computations must be made to partition some costs among various functions. The detail required to complete the TRP is not available since the original EIS filing did not require that data. Detailed documentation must be provided for all items listed in the TRP including worksheets and

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<sup>3</sup> Designation Order, paras. 5-78.

<sup>4</sup> Designation Order, para. 81, App. A.

<sup>5</sup> Designation Order, para. 81.

<sup>6</sup> Id.

<sup>7</sup> Designation Order at 7-11.

narratives.<sup>8</sup> The development of this data in the format required is a complex and time consuming undertaking which by itself will require more than a three week period.

In addition, the issues designated for investigation

Investigation, due August 24.<sup>12</sup>

BellSouth's request for an additional 30 days in which to file its Direct Case is not unreasonable, especially in view of the fact that other parties were given 30 days in which to file comments and oppositions. The additional time requested to file rebuttals is similarly reasonable. Moreover, since the tariffs in question are subject to an accounting order, the Commissions' grant of this motion will not unduly burden or prejudice any party.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: *Helen A. Shockey*  
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August 2, 1993

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<sup>12</sup> 1993 Annual Access Tariff Filings, CC Docket No. 93-193, DA 93-762, released June 23, 1993.

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**ORDER**

After due consideration, it is hereby ORDERED that the motion for extension of time, filed by BellSouth Telecommunications, Inc. ("BellSouth") on August 2, 1993 is granted. Direct Cases must be filed no later than September 13, 1993. Pleadings responding to the direct cases may be filed no later than October 13, 1993. Rebuttals may be filed no later than November 15, 1993.

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August \_\_, 1993.

CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of August, 1993 serviced all parties to this action with a copy of the foregoing MOTION FOR EXTENSION OF TIME by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to the parties as set forth in the accompanying service list:

  
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